

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MISSOURI  
KANSAS CITY, MISSOURI

DENVER LANE PARRISH )  
                        )  
Plaintiff,             )  
                        )  
v.                      ) Case No. 4:19-CV-00090-SRB  
                        )  
DEAN WORD COMPANY LTD, et al. )  
                        )  
Defendants.           )

**JOINT PROPOSED SCHEDULING ORDER AND DISCOVERY PLAN**

Plaintiff Denver Lane Parrish, by and through their counsel of record, submit the following Joint Proposed Scheduling Order and Discovery Plan pursuant to the Court's Order.

1. Pursuant to Fed. R. Civ. P. 25(f) and Local Rules 16.1(d), 16.1(f) and 26.1(d), a meeting was held by telephone and was attended by:
  - i. James Walker, counsel for Plaintiff
  - ii. Bridgette Fu, Counsel for Defendants.
2. Pending Motions: Defendants' Motion to Dismiss and Defendants' Amended Motion to Transfer.
3. Proposed Scheduling Order: Pursuant to Local Rules 16.1(d) and (f), the parties propose that the following Scheduling Order be entered in this matter:
  - i. The parties agree that any Motion for Leave to Join Additional Parties shall be filed by June 10, 2019;
  - ii. The parties agree that any Motion for Leave to Amend the Pleadings shall be filed by June 10, 2019;

- iii. The parties agree that Plaintiff shall designate any expert witnesses on or before June 10, 2019;
- iv. The parties agree that Plaintiff shall produce experts for deposition by July 25, 2019;
- v. The parties agree that Defendants shall designate any expert witnesses on or before August 26, 2019;
- vi. The parties agree that Defendants shall produce experts for deposition by October 10, 2019;
- vii. The parties agree that all discovery pertaining to this case shall be completed by November 7, 2019;
- viii. The parties agree that any dispositive motions shall be filed by December 10, 2019.

4. Discovery Plan:

- i. The parties agree to exchange initial disclosures to pursuant to Fed. R. Civ. P. 16(1) on or before May 10, 2019;
- ii. The parties agree to limitations on discovery set forth in the Federal Rules of Civil Procedure.
- iii. Discovery will be sought on the following subjects:
  - i. The basis of Plaintiff's claims set forth in the pleadings and the;
  - ii. Defendants' defenses to Plaintiff's claims; and
  - iii. The nature and extend of Plaintiff's alleged damages

5. Trial: The parties agree that, at this time, a jury trial of Plaintiff's claims is expected to take approximately 5 days. The parties expect to be prepared for trial commanding on April 20, 2020.
6. Other Orders: The parties do not anticipate the need for a protective order in this matter.

Respectfully submitted,

/s/ James D. Walker, Jr.  
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*Attorneys for Defendants*

#### CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing was filed with the Court's electronic filing system, with notice of case activity to be generated and sent electronically by the Clerk of said Court on this 2nd day of April 2019, to all parties of record.

/s/James D. Walker, Jr.  
Attorney Plaintiff